

Claims 1 and 15 have been amended to correct a minor typographical error, changing "removable" to read "removably". Such amendment to claims 1 and 15 is believed to correct an informality and does not otherwise affect or narrow the claim element with respect to patentability. Therefore, Applicants believe that this amendment does not create prosecution history estoppel with respect to these claim elements and further does not affect the range of equivalents with respect thereto.

Claims 1-3, 7-15, 18, 22-25 and 27 stand rejected under 35 U.S.C. §102(b) as being anticipated by Denovich et al., U.S. Patent No. 6,254,421 ("Denovich"). Applicants traverse this rejection and respectfully submit that the pending claims are allowable.

It is well established that anticipation requires the disclosure in a single prior art reference of each element of the claim under consideration. As such, for an anticipation rejection, all of the elements and limitations of the claim must be found within a single prior art reference. Moreover, the Examiner bears the initial burden of establishing a *prima facie* case of anticipation.

It is respectfully submitted that *Denovich* does not disclose each element of claims 1-3, 7-15, 18, 22-25 and 27. As understood, *Denovich* discloses a connector assembly that occupies minimal circuit board real estate, enabling close side-by-side spacing on the circuit board. *Denovich* describes the connector assembly as follows:

The housing includes preferably a single board-mounting section that extends into a mounting hole of the circuit board real estate...allowing close side-by-side spacing of several such modules...(Column 1, lines 40-45).

Fig. 10 is illustrative of the compact design of connector assembly 110. Using only a single board-mounting peg 144, minimal real estate of the circuit board is thus used, allowing several connectors assemblies 110, 110 to be positioned adjacent each other, side-by-side in a row. (Column 3, lines 47-51).

Claim 1 now recites "a connector comprising a housing defining an interior channel and having two opposing sides ... wherein the connector is adapted to be removably connected to at least one other connector by an ultrasonic weld", among other features. *Denovich* does not teach or otherwise suggest "the connector adapted to be removably connected to at least one other connector by an ultrasonic weld". *Denovich* does not disclose each of the elements of claim 1 as amended, and therefore the rejection is respectfully traversed.

Claims 2-3 and 7-14, which depends directly or indirectly from independent claim 1, recite additional features and are believed allowable for all the reasons provided above with respect to claim 1. More specifically, *Denovich* does not disclose "the connector is adapted to be removably connected to at least one other connector by an ultrasonic weld" in combination with: "the connector is adapted to be removably connected to said at least one other connector on one of said two opposing sides" as recited by claim 2, among other features; the "housing is formed of a nonconductive material" as recited by claim 3, among other features; the "housing is formed of at least two different materials" as recited by claim 7, among other features; the "crimping device is positioned in said housing adjacent said channel" as recited by claim 8, among other features; "a crimping portion adapted to engage said crimping device" as recited by claim 9, among other features; a lower surface of said crimping portion is adapted to engage an upper portion of said crimping device as recited by claim 10, among other features; the "housing includes opposing first and second engagement surfaces defining at least one opening fluidly communicating with said channel and adapted to receive said electrical cable" as recited by claim 11, among other features; the "first and second engagement surfaces define a first pair of planes different from a pair of planes defined by said two opposing sides" as recited by claim 12, among other features; the "crimping portion defines at least one opening fluidly communicating with said channel and adapted to receive said electrical cable" as recited by claim 13, among other features; and "a connecting plate adjacent said channel and adapted to provide an electrical

connection between electric cables received therein" as recited by claim 14, among other features.

Claim 15 now recites "a connector device adapted to be used with an electrical cabling ... a first connector having ... opposing sides ... a second connector having ... opposing sides ... wherein at least one of said opposing sides of said first connector is removably connected to one of said sides of said second connector" among other features. *Denovich* does not teach or otherwise suggest, "at least one of said opposing sides of said first connector is removably connected to one of said sides of said second connector". *Denovich* does not disclose each of the elements of claim 15 as amended, and therefore the rejection is respectfully traversed.

Claims 18, 22-25, which depend directly or indirectly from independent claim 15, recite additional features and are believed allowable for all the reasons provided above with respect to claim 15. More specifically, *Denovich* does not disclose the "at least one of said opposing sides of said first connector is removably connected to one of said sides of said second connector" in combination with: the " housings are formed of a nonconductive material" as recited by claim 18, among other features; the "first connector housing is formed of one nonconductive material and said second connector housing is formed of a second nonconductive material" as recited by claim 22, among other features; "a crimping device is positioned in each of said housings adjacent to a channel defined therein" as recited by claim 23, among other features; the "first and second connectors further include a crimping portion adapted to engage said crimping device" as recited by claim 24, among other features; and "a connecting plate adjacent to said channel and adapted to provide an electrical connection between cabling received therein" as recited by claim 25, among other features.

Claim 27 recites "a method for splicing electric cabling, the method comprising ... inserting ... cabling into at least one of a plurality of splice connectors that form a connector stick device ... separating said at least one connector from said connector stick device using a tool ...", among other

features. *Denovich* does not teach or otherwise suggest "a connector stick device" alone or in combination with "separating said at least one connector from said connector stick device using a tool". *Denovich* does not disclose each of the elements of claim 27, and therefore the rejection is respectfully traversed.

Claims 4-6 and 19-21 stand rejected under 35 U.S.C. §103(a) as being unpatentable over *Denovich*. Applicants traverse this rejection and respectfully submit that the pending claims are allowable. Claims 4-6, which depend indirectly from independent claim 1, recite additional features and are believed allowable for all the reasons provided above with respect to claim 1. More specifically, *Denovich* does not disclose "the connector is adapted to be removably connected to at least one other connector by an ultrasonic weld" of claim 1 in combination with: the "housing is formed of a nonconductive material" of claim 3 in further combination with the "housing is formed of a polycarbonate material" as recited by claim 4, among other features; the "housing is formed of a polyester material" as recited by claim 5, among other features; and the "housing is formed of a polypropylene material" as recited by claim 6, among other features.

Claims 19-21, which depend directly or indirectly from independent claim 15, recite additional features and are believed allowable for all the reasons provided above with respect to claim 15. More specifically, *Denovich* does not disclose the "at least one of said opposing sides of said first connector is removably connected to one of said sides of said second connector" in combination with: the " housings are formed of a polycarbonate material" as recited by claim 19, among other features; the " housings are formed of a polyester material" as recited by claim 20, among other features; and the " housings are formed of a polypropylene material" as recited by claim 21, among other features.

Claims 16-17, 26 and 28 stand rejected under 35 U.S.C. §103(a) as being anticipated by *Denovich* in view of Teytaud, U.S. Patent No. 4,219,249

("Teytaud"). Applicants traverse this rejection and respectfully submit that the pending claims are allowable.

It is respectfully submitted that the Examiner has failed to provide any motivation to combine *Denovich* and *Teytaud*. The mere fact that the references may be combined does not render the resultant combination obvious unless the prior art also suggests the desirability of such combination. Thus, an Examiner cannot merely provide a statement of operability, but must explain why one of ordinary skill would be motivated to combine the references.

The Examiner has failed to provide such an explicit motivation. The Examiner states that "it would have been obvious to one with ordinary skill in the art to modify the connector of *Denovich et al.* by using ultrasonic weld to connect the connectors as taught in *Teytaud* to obtain an easy and accomplished weld between connectors". (Office Action, page 5, lines 10-12).

Generally, the "motivation to combine or modify" references includes identifying some element or function that calls out for such combination or modification. Otherwise, is difficult for the Examiner to set forth a convincing rationale for one of ordinary skill to be motivated to make the combination or modification, and it would appear that the Examiner is merely using the claims as a template.

The Examiner has not identified any element in *Denovich* that would suggest such a combination. More specifically, as provided previously, *Denovich* discloses "a single board-mounting peg 144 minimal real estate of the circuit board is used; allowing several connectors assemblies 110, 110 to be positioned adjacent each other, side-by-side in a row. (Column 3, lines 46-50). *Denovich* does not disclose the first connector and second connector of claims 16 and 17, the plurality of connectors of claim 26 nor the plurality of splice connectors that form a connector stick device of claim 28. As *Denovich* fails to teach the first connector and second connector as recited by claim 16 and 17, the plurality of connectors as recited 26, or the plurality of splice connectors as recited by claim

28, there is no reason to use an ultrasonic weld to connect the different connectors as proposed by the Examiner.

Furthermore, the cited references do not disclose or otherwise suggest all the features of the claimed invention as set forth in claims 16-17, 26 and 28. Claims 16 and 17, which depend from independent claim 15, and claim 28, which depends from independent claim 27, recite additional features thereto and are believed allowable for all the reasons provided above with respect to claims 15 and 27. More specifically, neither *Denovich* nor *Teytaud* teach or otherwise suggest "at least one of said opposing sides of said first connector is removably connected to one of said sides of said second connector" in combination with the "first and second connectors are removably connected by a weld" as recited by claim 16, among other features; "at least one of said opposing sides of said first connector is removably connected to one of said sides of said second connector" in combination with the "first and second connectors are removably connected by an ultrasonic weld" as recited by claim 17, among other features; nor the "method for splicing electric cabling, the method comprising ... inserting ... cabling into at least one of a plurality of splice connectors that form a connector stick device ... separating said at least one connector from said connector stick device using a tool" in combination with the "plurality of connectors are removably connected to form said connector stick device using an ultrasonic weld" as recited by claim 28, among other features. Additionally, neither *Denovich* nor *Teytaud* teach or otherwise suggest the "connector stick device adapted to be connected to at least two electrical cables using a crimping device ... a plurality of connectors ... each of said connectors having opposing sides ... wherein at least one of said opposing sides of each connector is removably connected to one of said opposing sides of a different connector by an ultrasonic weld" as recited by claim 26, among other features.

New claim 29 recites "a connector comprising a housing defining an interior channel and having two opposing sides ... wherein the connector is adapted to be connected to at least one other connector", among other features.

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As the cited references neither teach nor suggest the "connector is adapted to be connected to at least one other connector", claim 29 is believed allowable for all the reasons provided above.

In view of the foregoing, it is respectfully submitted that the pending claims define allowable subject matter. Should anything remain in order to place the present application in condition for allowance, the Examiner is kindly invited to contact the undersigned at the telephone number listed below.

Attached hereto is a marked-up version of the changes made to the specification and the claims by the current amendment. The attached page is captioned **"Version with markings to show changes made."**

Please charge any additional fees or credit overpayment to the Deposit Account of McAndrews, Held & Malloy, Ltd., Account No. 13-0017.

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Version With Markings to Show Changes Made

In the Title:

The title is amended as follows:

Ultrasonic Welded [Telsplice] Connector Stick

In the Claims:

Claims 1 & 15 were amended as follows:

1. (Amended) A connector comprising:

a housing defining an interior channel and having two opposing sides; and

a crimping device movably positioned inside said housing and adapted to secure at least one electrical cable in said channel;

wherein the connector is adapted to be [removable] removably connected to at least one other connector by an ultrasonic weld.

15. (Amended) A connector device adapted to be used with an electrical cabling, said device comprising:

a first connector having a housing and opposing sides; and

a second connector having a housing and opposing sides;

wherein at least one of said opposing sides of said first connector is [removable] removably connected to one of said sides of said second connector.

--29. (New) A connector comprising:

a housing defining an interior channel and having two opposing sides; and

a crimping device movably positioned inside said housing and adapted to secure at least one electrical cable in said channel;

wherein the connector is adapted to be connected to at least one other connector.--